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11 IN THE UNITED STATES DISTRICT COURT
12
13 EASTERN DISTRICT OF CALIFORNIA

14
15 UNITED STATES OF AMERICA,
Plaintiff,
v.
RAYMOND BREWER,
Defendant.

16
17 CASE NO. 1:20-CR-00198-JLT-BAM
JOINT STIPULATION AND ORDER
EXTENDING THE UNITED STATES'
DEADLINE TO FILE AN OPPOSITION TO
LC EQUITY GROUP, INC.'S MOTION FOR
ORDER EXPUNGING LIS PENDENS (Doc.
32)
Date: TBD
Time: TBD
Courtroom: TBD

18 On October 29, 2020, defendant Raymond Brewer was charged by indictment with wire
19 fraud (Counts One through Nine – 18 U.S.C. § 1343), aggravated identity theft (Count Ten - 18
20 U.S.C. § 1028(A)(a)(1)), and money laundering (Counts Eleven through Sixteen - 18 U.S.C. §
21 1956(a)(1)(B)(i) and Counts Seventeen through Twenty-Four 18 U.S.C. § 1957). Doc 1. The
22 indictment sought forfeiture of Brewer's interest in all property which constitutes or is derived
23 from proceeds traceable to a violation of 18 U.S.C. § 1343, and any property involved in or
24 traceable to a violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1957. *Id.*, Forfeiture Allegation.
25 That property included the following:

- 26 a. Real property located at Lot 1 Mountain View Road, Montana, Madison
27 County, APN: 25-0506-13-1-01-05-0000;
28 b. Real property located at 804B E. Worth Avenue, Porterville, Tulare

1 County, California, APN: 271-060-019-000.

2 On November 18, 2020, the United States recorded its Lis Pendens Notice of Pending
3 Action with the Tulare County Recorder's Office against the property that is the subject of this
4 motion. *See* Doc. 19. The United States provided notice by certified mail to the individuals or
5 entities on title to the real property, one of whom is LC Equity Group. *See* Doc. 19 at p. 7. On
6 May 25, 2021, the United States filed its recorded lis pendens in this case. Doc. 19.

7 On January 27, 2022, LC Equity Group, Inc. filed a motion for order expunging the lis
8 pendens. Doc. 32. A hearing date has not yet been set by the court. Counsel for the United
9 States and counsel for LC Equity Group previously met and conferred regarding the Motion and
10 agreed to extend the time for the United States to oppose the Motion while the parties engaged in
11 discussions regarding the Motion. Based on the agreement of counsel, the Court approved a
12 stipulation extending the deadline for the United States to February 24, 2020. Doc. 37. Counsel
13 again met and conferred and jointly request that the deadline for the United States to oppose the
14 Motion be extended for two weeks as the parties are continuing their meeting and conferring to
15 resolve the issues without court intervention. Accordingly, with the Court's approval, the United
16 States and LC Equity Group, Inc. hereby stipulate and agree that the United States' deadline for
17 filing the Opposition to the Motion be extended to March 10, 2022.

18 Dated: February 24, 2022

PHILLIP A. TALBERT
United States Attorney

20 By: /s/ Alyson A. Berg
21 JOSEPH BARTON
22 HENRY Z. CARBAJAL III
ALYSON A. BERG
Assistant United States Attorneys

24 Dated: February 23, 2022

By: /s/ Richard J. Reynolds
RICHARD J. REYNOLDS
Attorney for LC Equity Group, Inc.
(Original signature retained by attorney)

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STIPULATION AND [PROPOSED] ORDER EXTENDING THE
UNITED STATES' DEADLINE TO FILE AN OPPOSITION TO LC
EQUITY GROUP, INC.'S MOTION FOR ORDER EXPUNGING LIS
PENDENS

ORDER

Before this Court is the United States' stipulated request for an order extending the opposition to March 10, 2022, as proposed by the parties. The proposed filing date is adopted herein.

IT IS SO ORDERED.

IT IS SO ORDERED.

Dated: February 24, 2022

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE